

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA GOEDINGHAUS,	§	
	§	
Plaintiffs,	§	Case No. 5:23-cv-00580-FB
	§	
v.	§	
	§	
TRAMMELL S. CROW, JR., DR. BENJAMIN TODD ELLER, RICHARD HUBBARD, DR. MELISSA MILLER, DR. JOSEPH BOLIN, DR. SCOTT WOODS, DR.	§	Judge: Hon. Fred Biery
MRUGESHKUMAR SHAH, MICHAEL CAIN, COE JURACEK, PHILIP ECOB, H.J. COLE, TEXAS RANGER CODY MITCHELL, KURT KNEWITZ, PAUL PENDERGRASS, RALPH ROGERS, ROBERT PRUIT, SCOTT	§	Courtroom: 8509
BRUNSON, CASE GROVER, RICHARD BUTLER, MARC MOLINA, MICHAEL HYNES, JR., SHAWN MAYER, JADE	§	Date Action Filed: May 8, 2023 (transferred)
MAYER, RCI HOSPITALITY HOLDINGS, INC., INTEGRITY BASED MARKETING, LLC, STORM FITNESS NUTRITION, LLC, ULTRA COMBAT NUTRITION, LLC, ECOLIFT HOMES LLC, ELEVATED WELLNESS PARTNERS LLC, DOE	§	
INDIVIDUALS 1–20, and DOE COMPANIES 21–30	§	
Defendants.	§	
	§	

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**UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS**

Defendant Trammell S. Crow, Jr. (“Crow”) requests leave to exceed the Court’s page limits and permit Crow to file a reply in support of his motion to dismiss that is up to thirteen (13) pages long.

Pursuant to Local Rule CV-7(D), parties are limited to ten (10) pages for replies in support of non-discovery motions. Plaintiffs’ Amended Complaint is 74 pages long,<sup>1</sup> asserts claims against

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<sup>1</sup> Plaintiffs’ Amended Complaint is ten pages longer than the original Complaint. *Compare* Dkt. 1 and Dkt. 190.

thirty named individuals (plus additional unnamed individuals and companies),<sup>2</sup> and asserts four causes of action against all defendants. *See, e.g.*, Am. Comp. at 68. This request for three (3) additional pages in Crow's reply brief is not for the purpose of delay or to complicate the proceedings, but in order to ensure that the issues in dispute are clearly presented to the Court. *See Exhibit A.*

Crow has met and conferred with counsel for Plaintiffs and they are unopposed to the relief requested.

DATED: August 22, 2023

Respectfully submitted,

/s/ Kenneth C. Stone

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*Attorneys for Defendant  
Trammell S. Crow, Jr.*

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<sup>2</sup> By amendment, Plaintiffs added an additional defendant, Aaron Burlingame.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion was served on all counsel of record via ECF on August 22, 2023:

*/s/ Kenneth C. Stone*  
Kenneth C. Stone

*Attorneys for Defendant Trammell S. Crow, Jr.*

**CERTIFICATE OF CONFERENCE**

The undersigned conferred with Matthew W. Schmidt, counsel for Plaintiffs, via email on August 21, 2023, and Mr. Schmidt stated Plaintiffs are unopposed to the relief requested.

*/s/ Kenneth C. Stone*  
Kenneth C. Stone